

# Municipal Perspectives on the Draft MS4 Permit

## Agenda

The Permit Themes

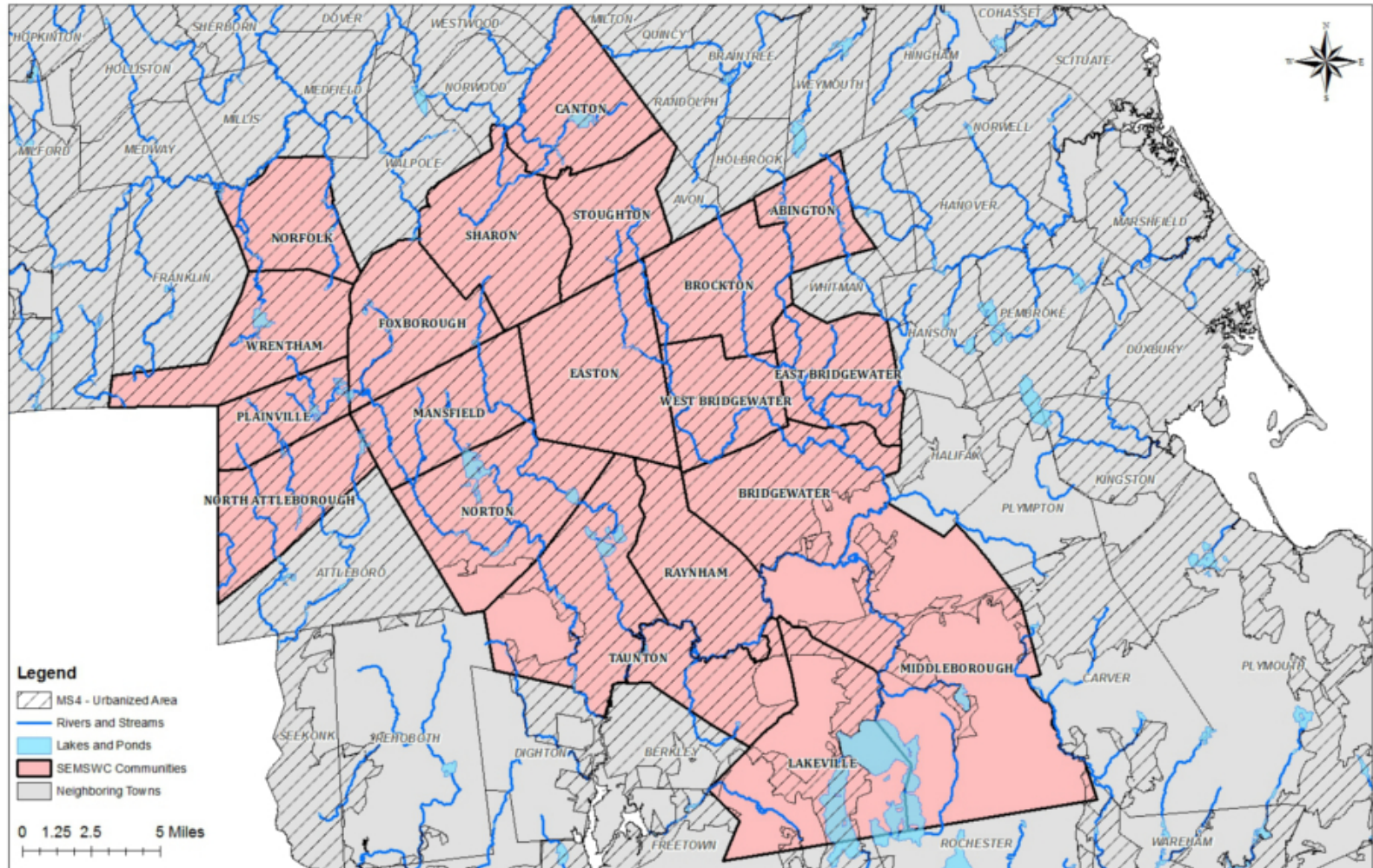
The Municipal Perspective

The Cost

The Reality



# SERSG - SEMSWC



# The Permit Themes

- Waterbody Based
- Professional
- Proactive
- Partner
- Protective





# The Municipal Perspective

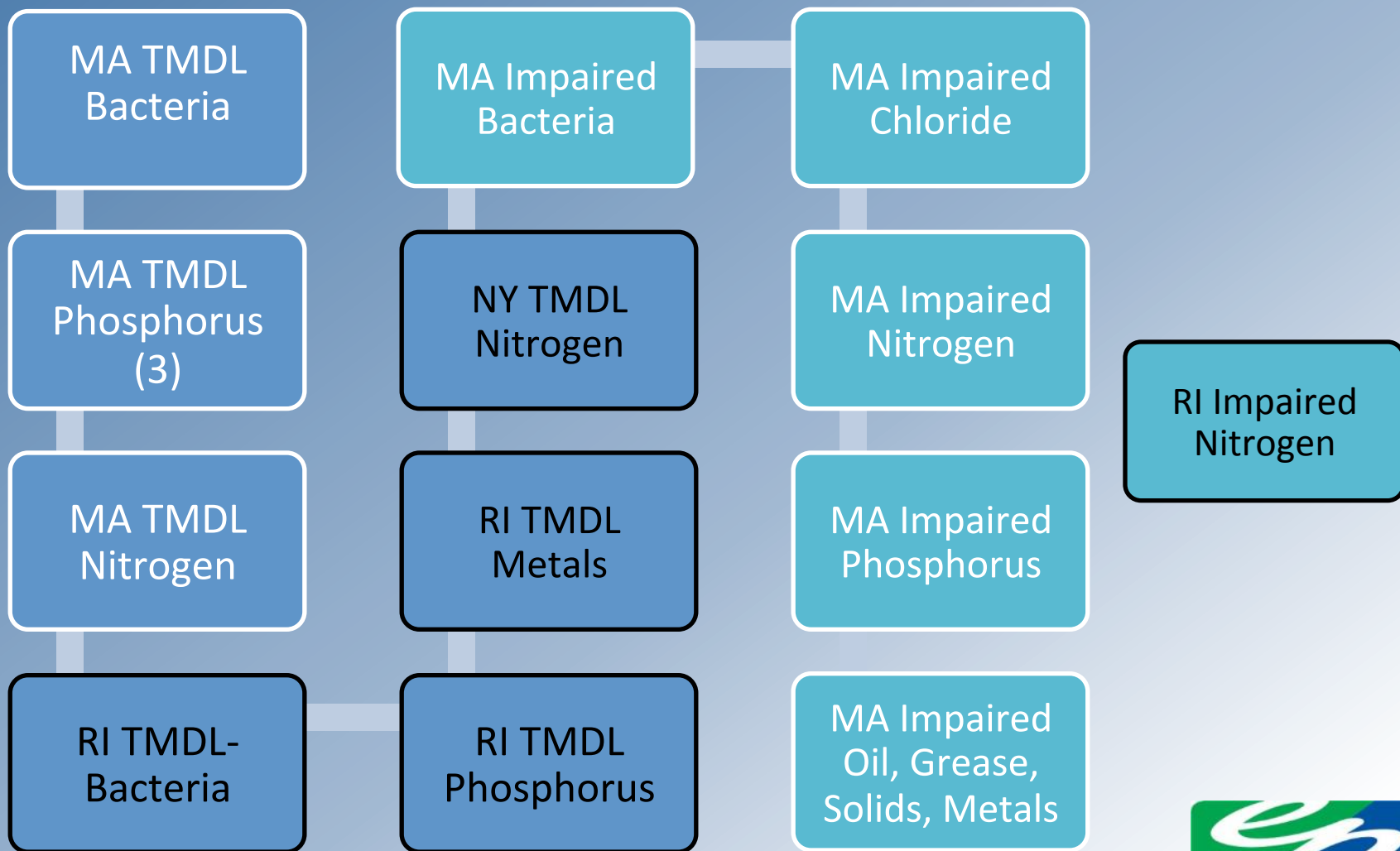
- Waterbody Based
- Professional
- Proactive
- Partner
- Protective
- Complicated
- Prescriptive
- Assertive schedule
- Nice in theory, but...
- At what cost?

“Unfunded Mandate”



# Waterbody Based - Complicated

Every community has different requirements



# Professional - Prescriptive

Activity	MA TMDL	RI TMDL	NY TMDL	MA Impaired	RI Impaired
1	Bacteria	Bacteria		Bacteria	
2	Nitrogen Assabet P	Phosphorus	Nitrogen	Nitrogen Phosphorus	Nitrogen
3	Nitrogen Assabet P	Phosphorus Metals	Nitrogen	Nitrogen Phosphorus Metals, etc.	Nitrogen
4		Phosphorus	Nitrogen	Nitrogen Phosphorus	Nitrogen
5				Chloride	
6	Phosphorus				

1: MCM1x2 + MCM3/IDDE=High

2: MCM1x3

3: MCM5 + MCM6

4: Source Identification Report + IC + DCIA + BMP

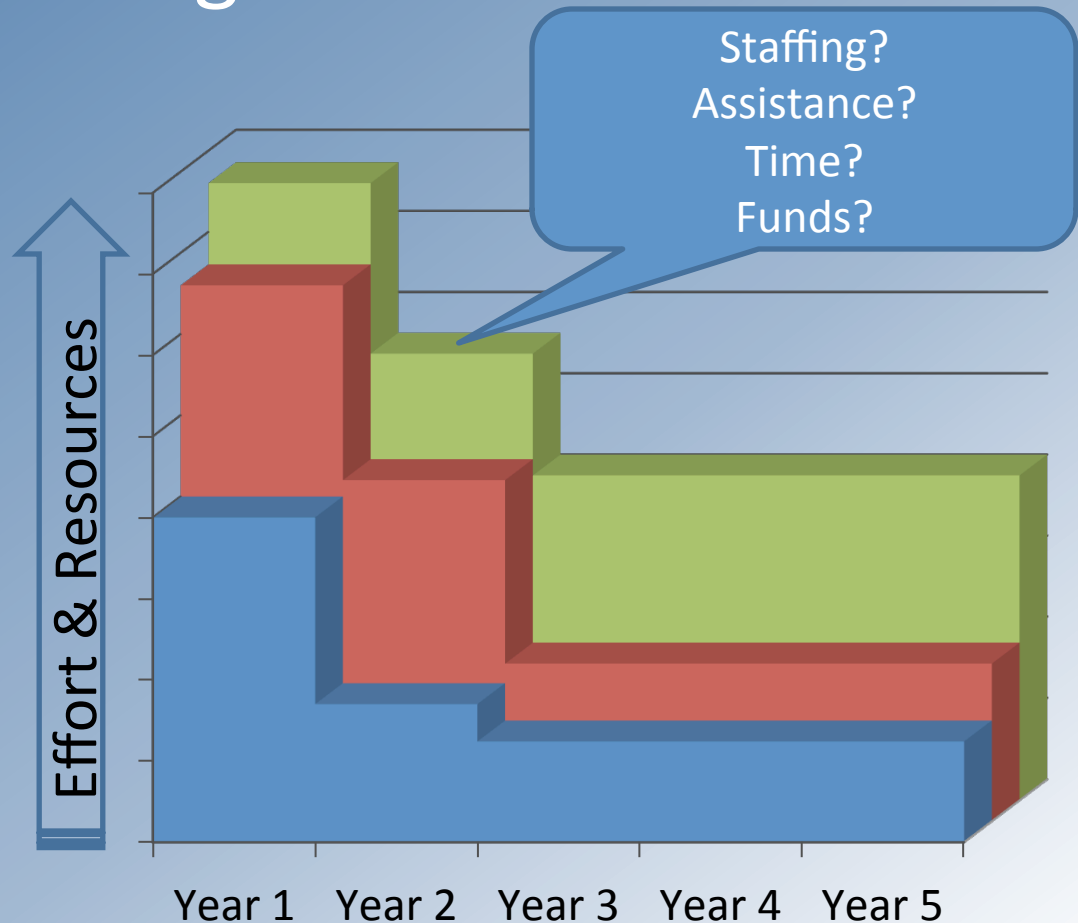
5: Salt Reduction Plan + Ordinance + MCM1 + MCM5

6: Charles River PCP, Lakes & Ponds PCP



# Proactive Assertive Program Schedule

- Urban  
Charles River
- Urban  
Suburban
- Suburban  
No Sewer



Program and investigation only  
Not including system repairs



# Partner

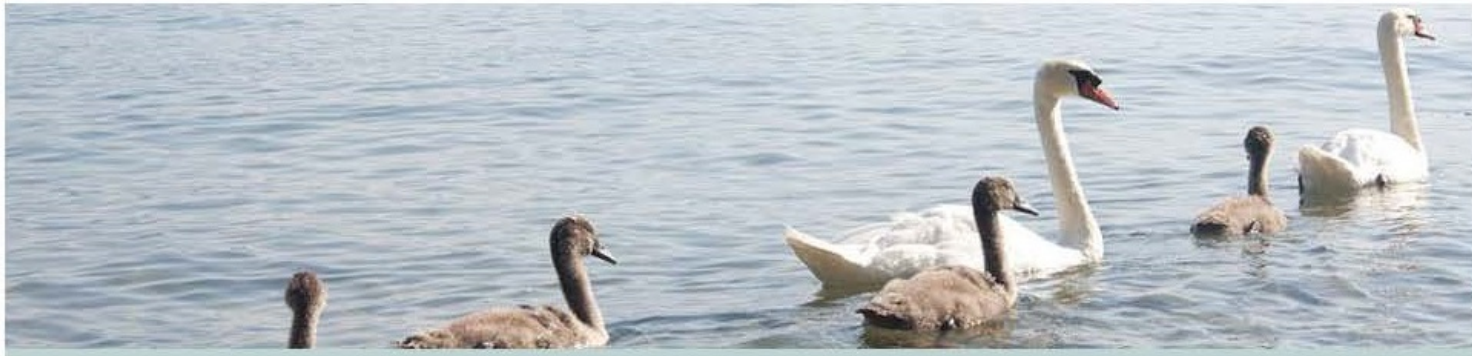
## Partnering is historically difficult



CENTRAL MASSACHUSETTS REGIONAL STORMWATER COALITION

Southeastern Massachusetts Stormwater Collaborative

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# Protective – At What Cost?

## Annual Additional M\$4 Compliance Costs

- Urban  
Charles River
- Urban  
Suburban
- Suburban  
No Sewer



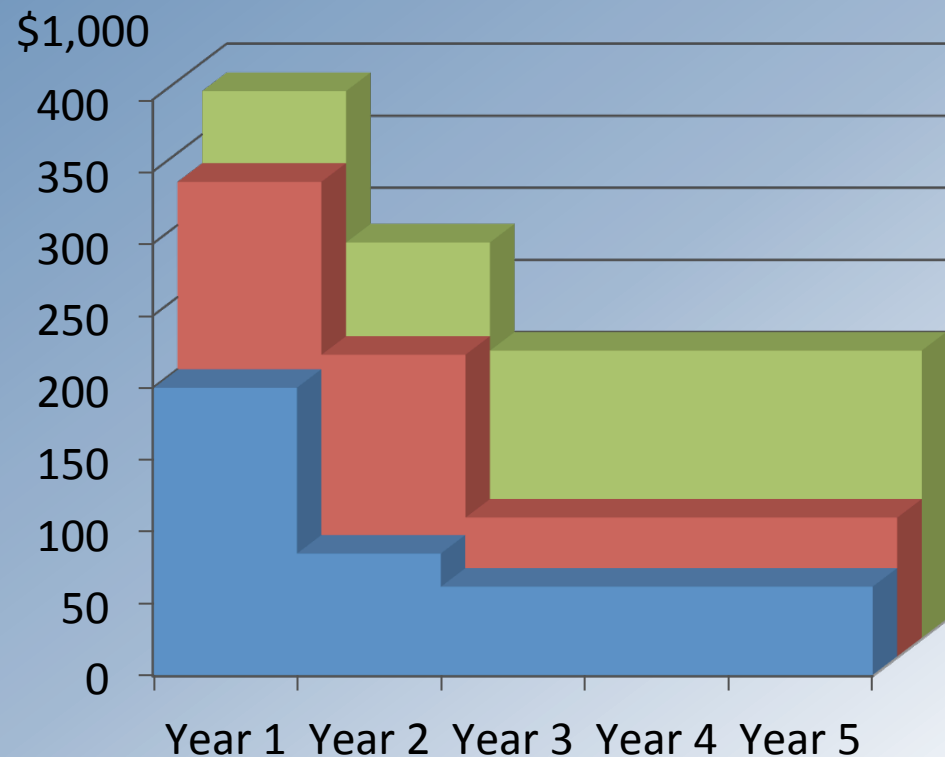
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# Protective – At What Cost

## Annual Additional M\$4 Compliance Costs

- Urban  
Charles River
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No Sewer



Program and investigation only  
Not including system repairs



# The Cost

## Total M\$4 Costs

Structural BMPs  
\$3,000 to \$54,000  
per pound of  
removed phosphorus  
(EPA Fact Sheet)

Suburban

Urban  
Suburban

Charles River

Pounds to Remove  
**Median 600**  
**Average 860**



# The Cost

## Total M\$4 Program Costs

\$85 million to \$195 million

Best Case Scenario

Phosphorus Control

Construction Costs

(EPA Fact Sheet)

Bellingham  
\$4,800,000

Milford  
\$5,600,000

Franklin  
\$9,800,000

*From: Sustainable Stormwater Funding in the Upper Charles River Communities of Bellingham, Franklin, and Milford (HWG/AMEC) 2011*





# The Reality

- The MS4 permit is coming
  - It is a complex compilation of semi-individual permits
  - It will take time and resources to set up
- It is time to
  - Get your constituents on board
  - Examine funding strategies
  - Appropriate funds for FY16 to understand your future budget



# Municipal Perspectives on the Draft MS4 Permit

## Thank You

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